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May 19, 2023

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**VIA ECF** 

Hon. Alvin K. Hellerstein U.S. District Court Southern District of New York 500 Pearl Street New York, NY 10007 SO ORDERED.

/s/ Alvin Hellerstein U.S.D.J. May 22, 2023

Re: *United States v. Domingo Beato Estrella*, 20 Cr. 324 (AKH)

Dear Judge Hellerstein:

We represent defendant Domingo Beato Estrella in this matter. Defense motions are currently due May 22, the government's response is due June 12, and any reply is due June 19.

We respectfully request a two-week extension of the motion deadlines. Mr. Beato Estrella was recently transferred to custody in Philadelphia, in connection with other proceedings, making it difficult to discuss a potential defense motion with him. He is expected to return to custody in New York in the near future, and the additional time will allow us to discuss with him a potential motion. The government has no objection to this request.

Under the new proposed schedule, defense motions would be due June 5, the government's opposition would be due June 26, and any reply would be due July 3, with oral argument at the Court's convenience. This is the second request for an extension of the motion deadline in this case.

We appreciate the Court's consideration.

Respectfully submitted,

/s/ Brendan F. Quigley
Brendan F. Quigley

CC: Counsel of record (via ECF)